

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

YELLOW CORPORATION, *et al*¹.

**Chapter 11
Case No. 23-11069 (CTG)
(Jointly Administered)**

Debtors.

**Adversary Proceeding No. 23-50457
(CTG)**

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**JEFF MOORE, ELIZABETH BROOKE MOORE,
VIDAL TORRES, ARMANDO RIVERA, JOHN
FRANKLIN, JR., NICOLE GONZALEZ,
RICHARD WEBB, SCOTT WEBB, DARYL
DEVINE, RICHIE RICHARDSON, PAUL
ASHLEY, BRANDON WILSON, DUSTIN PAGE,
KIMBERLY SULLIVAN, ANTONIO REYES,
SPENCER SHOOK, JOSEPH DUGUAY, SHEILA
WOOD, SHELDON KINNEY, DUSTIN KELL,
CHRISTOPHER DOWDY, ALEXIS GREEN,
GREGORY HALL, MIGUEL MARTINEZ,
RHONDA DVORAK and RODNEY DAMM, JR.
on behalf of themselves and all others similarly
situated,**

Plaintiffs,

v.

**YELLOW CORPORATION; USF REDDAWAY
INC.; 1105481 ONTARIO INC.; YELLOW
FREIGHT CORPORATION; EXPRESS LANE
SERVICE, INC.; YELLOW LOGISTICS, INC.;
NEW PENN MOTOR EXPRESS LLC; YRC
ASSOCIATION SOLUTIONS, INC.; ROADWAY
EXPRESS INTERNATIONAL, INC.; YRC
ENTERPRISE SERVICES, INC.; ROADWAY
LLC; YRC FREIGHT CANADA COMPANY;**

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 511500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

**ROADWAY NEXT DAY CORPORATION; YRC
INC.; USF BESTWAY INC.; YRC
INTERNATIONAL INVESTMENTS, INC.; USF
DUGAN INC.; YRC LOGISTICS INC.; USF
HOLLAND INTERNATIONAL SALES
CORPORATION; YRC LOGISTICS SERVICES,
INC.; USF HOLLAND LLC; YRC MORTGAGES,
LLC; USF REDSTAR LLC AND YRC
REGIONAL TRANSPORTATION, INC.**

Defendants.

**MOORE PLAINTIFFS' MOTION IN LIMINE GOVERNING HOW QUESTIONS
CONCERNING MONETARY RELIEF SHALL BE TREATED AT TRIAL**

Plaintiffs hereby respectfully move in limine for an order governing how questions concerning monetary relief be treated at the upcoming trial. Plaintiffs request an order which provides that the calculation of specific monetary relief be determined by stipulation or by the Court, following entry of a judgment on liability. As grounds for the motion, Plaintiffs state as follows:

Under the WARN Act and state law equivalents, the calculation of monetary relief for successful claimants is largely a matter of mathematics. It involves finding each affected employee's applicable pay rate and determining the appropriate amount of pay for the days of violation. *See* 29 U.S.C. § 2104. It also involves finding the relevant benefits under employee benefit plans. *Id.*

Since this is a case brought on behalf of thousands of class members, it will be more efficient for the parties to stipulate to the monetary relief post-trial, once liability has been determined, rather than requiring the calculations be performed and presented at trial. If no stipulation can be reached, the amount can be determined by a limited post-trial proceeding before the Court.

Dated: January 6, 2025
Wilmington, Delaware

Respectfully,

By: /s/ Mary E. Olsen
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